

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**APRIL LEWIS, Individually and on behalf of all  
others similarly situated,**

**Plaintiff,**

**v.**

**MOUNTAIN VIEW HOSPITAL, LLC, d/b/a  
MOUNTAIN VIEW HOSPITAL,**

**Defendant.**

**Case No.: 3:24-cv-00175**

**District Judge Aleta A. Trauger**

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**STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S  
CLASS ACTION COMPLAINT**

Defendant Mountain View Hospital, LLC d/b/a Mountain View Hospital (“Mountain View”), pursuant to Fed. R. Civ. P. 6(b) and LR6.01, hereby moves for an extension of time to answer or otherwise respond to Plaintiff’s Complaint, up to and including May 9, 2024. Plaintiff stipulates to the relief requested herein. Good cause exists to grant this extension on the following grounds:

1. On January 11, 2024, Plaintiff filed a putative class action complaint (“Complaint”) in the Circuit Court for the Twentieth Judicial District in Davidson County, Tennessee (“State Court Action”).

2. On January 17, 2024, Plaintiff served Defendant with the Complaint.

3. On February 15, 2024, Defendant removed the State Court Action to this Court.  
*See* Dkt. No. 1.

4. Pursuant to Fed. R. Civ. P. 81(c)(1)(C), Mountain View’s current responsive pleading deadline is February 22, 2024.

5. To promote judicial economy and preserve party resources, Plaintiff and Mountain View (together, the “Parties”) have been conferring regarding the above-captioned action, including exploring potential alternative dispute resolution.

6. To that end, the Parties have scheduled a mediation for April 9, 2024, before the Honorable Diane Welsh.

7. Good cause exists to support the granting of this motion because this extension will allow the Parties and their counsel to focus their efforts on meaningful settlement discussions, including the April 9, 2024 mediation.

8. The Parties stipulate to the requested extension.

WHEREFORE, Defendant Mountain View respectfully requests that the Court enter an order extending Mountain View’s responsive pleading deadline up to and including May 9, 2024.

Respectfully submitted on February 16, 2024

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2024, the foregoing document was electronically filed using the Court's Electronic Filing System, which will send a Notice of Electronic Filing to counsel in the CM/ECF system . All counsel of record will also be notified via e-mail.

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